

## **EXHIBIT 4**

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (WMW/DTS)

Plaintiff,

v.

**FEDERAL INSURANCE COMPANY'S  
SECOND SUPPLEMENTAL  
ANSWERS TO INTERROGATORY  
NOS. 2, 3, AND 4**

FEDERAL INSURANCE COMPANY,  
an Indiana corporation,

Defendant.

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To: Plaintiff and its attorneys, Allen Hinderaker and Michael A. Erbele, Merchant & Gould PC, 3200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402.

Defendant Federal Insurance Company ("Federal"), for its Second Supplemental Answers to Plaintiff's First Set of Interrogatories, states and alleges as follows:

**GENERAL RESPONSES**

1. Federal objects to the Definitions and Instructions to the extent that they seek to impose obligations on Federal that either exceed, or are different from, what is required under the Federal Rules of Civil Procedure, District of Minnesota Local Rules, and the Stipulated E-Discovery Order.

2. Federal's responses and objections are made to the best of Federal's present knowledge, information, and belief. Federal's responses and objections are limited to information within its possession, custody, or control. Federal reserves the right to

amend, supplement, or change any responses and objections if and when additional, different, or more accurate information becomes available and/or facts are developed.

3. Federal gives these Responses subject to all objections to admissibility that may be interposed in this proceeding.

**ANSWERS TO FIRST SET OF INTERROGATORIES**

**INTERROGATORY NO. 2:** Identify every person, division, or entity, other than employees of the division Chubb & Son, to whom Federal has disclosed the FICO Blaze Advisor® software after June 30, 2006, and:

- a. State the date of each such disclosure;
- b. Identify all Persons known to you to have knowledge of each such disclosure; and
- c. Identify all documents relating to each such disclosure.

**SECOND SUPPLEMENTAL ANSWER:** Federal objects to this Interrogatory as over broad and unduly burdensome to the extent that it seeks identification of all individuals to whom disclosure has been made, rather than the entities or divisions to which disclosure has been made. Federal further objects to this Interrogatory as overbroad and unduly burdensome because it is unlimited in time. Federal may appropriately limit its answer to available information after April 22, 2010, which is six years prior to the lawsuit being filed, but has not, at this time, withheld information based on this objection. Federal also objects to the term “disclosed” in this context as undefined and vague.

Subject to, and without waiving these objections, disclosure of the Blaze Advisor software was made to at least the following: (1) Chubb Insurance Company of Europe SE, (2) Chubb Insurance Company of Canada, including through its relationship with

AppCentrica, and (3) Chubb Insurance Company of Australia Limited, including through its relationship with the DWS Group. Disclosure of the Blaze Advisor software to the Chubb & Son division of Federal occurred on or around June 30, 2006 with FICO's knowledge and participation. Information regarding the Blaze Advisor software and accessibility to it were provided on internal Chubb organization shared space. Disclosure of the Blaze Advisor software was made to Chubb Insurance Company of Canada in 2011 with FICO's knowledge and participation. Disclosure was made to Chubb Insurance Company of Europe SE at least by 2010, with FICO's knowledge and participation. Disclosure was made to Chubb Insurance Company of Australia Limited at least by 2015.

Federal identifies Tamra Pawloski, Henry Mirolyuz, Ewen Setti, Hamish Tonkin, Alexander Pavlenko, Zorica Todorovic, Tony Zhang, Lei Lanz, Dalli Yang, Duff Sorli, Ramesh Pandey, Patrick Sullivan, Benku Thomas, John White, Miranda Chiang, Mark Ruscitto, Dan Tedeschi, Kott Sivakumar, Peter Tribulski, Russell Hodey, David Gibbs, David Rowlands, Peter Davis, Dejan Stojkovic, Ken Kitamura, Ben Pullinger, Martin Sill, Craig Worth, John Fagan, Jeff Pruski, Tanya Filstein, Russell Frost, Charles Nikolas, Diptesh Patel, Oliver Clark (FICO), Michael Sawyer (FICO), Ian Brodie (FICO), and Russell Schreiber (FICO) as persons who may have knowledge regarding use of the Blaze Advisor software.

Further answering Interrogatory No. 2, pursuant to Fed. R. Civ. P. 33(d), Federal refers to emails sent and received, including corresponding documents, by such individuals regarding use of the Blaze Advisor software in the United Kingdom, Canada,

and Australia, and states that the burden of identifying the emails relating to the use of the software in the United Kingdom, Canada, and Australia is substantially the same for both parties.

**INTERROGATORY NO. 3:** Identify every person, division, or entity, other than employees of the division Chubb & Son of which Federal is aware, that has used the FICO Blaze Advisor® software after June 30, 2006, and:

- a. State the date of first use and, if applicable, the date of the last use for each person, division, or entity;
- b. Identify all Persons known to you to have knowledge of each such use; and
- c. Identify all documents relating to each such disclosure.

**SECOND SUPPLEMENTAL ANSWER:**

Federal objects to this Interrogatory as over broad and unduly burdensome to the extent that it seeks identification of all individuals who have used the software, rather than the entities or divisions that have used the software. Federal further objects to this Interrogatory as overbroad and unduly burdensome because it is unlimited in time. Federal may appropriately limit its answer to available information after April 22, 2010, which is six years prior to the lawsuit being filed, but has not, at this time, withheld information based on this objection. Federal also objects to the term “use” in this context as undefined and vague.

Subject to, and without waiving these objections, use of the Blaze Advisor software was made by at least the following: (1) Chubb Insurance Company of Europe SE, (2) Chubb Insurance Company of Canada, including through its relationship with AppCentrica, and (3) Chubb Insurance Company of Australia Limited, including through

its relationship with the DWS Group. Federal began using the Blaze Advisor software in its Chubb & Son division on or around June 30, 2006 and did so with FICO's knowledge and participation. Information regarding the Blaze Advisor software and accessibility to it were provided on internal Chubb organization shared space. Chubb Insurance Company of Canada has used Blaze Advisor software since at least 2011, and did so with FICO's knowledge and participation. Chubb Insurance Company of Europe SE has used Blaze Advisor software since at least 2010, and did so with FICO's knowledge and participation. Chubb Insurance Company of Australia Limited has used Blaze software since at least 2015.

Federal identifies Tamra Pawloski, Henry Mirolyuz, Ewen Setti, Hamish Tonkin, Alexander Pavlenko, Zorica Todorovic, Tony Zhang, Lei Lanz, Dalli Yang, Duff Sorli, Ramesh Pandey, Patrick Sullivan, Benku Thomas, John White, Miranda Chiang, Mark Ruscitto, Dan Tedeschi, Kott Sivakumar, Peter Tribulski, Russell Hodey, David Gibbs, David Rowlands, Peter Davis, Dejan Stojkovic, Ken Kitamura, Ben Pullinger, Martin Sill, Craig Worth, John Fagan, Jeff Pruski, Tanya Filstein, Russell Frost, Charles Nikolas, Diptesh Patel, Oliver Clark (FICO), Michael Sawyer (FICO), Ian Brodie (FICO), and Russell Schreiber (FICO) as persons who may have knowledge regarding use of the Blaze Advisor software.

Further answering Interrogatory No. 3, pursuant to Fed. R. Civ. P. 33(d), Federal refers to emails sent and received, including corresponding documents, by such individuals regarding use of the Blaze Advisor software in the United Kingdom, Canada, and Australia, and states that the burden of identifying the emails relating to the use of

the software in the United Kingdom, Canada, and Australia is substantially the same for both parties.

**INTERROGATORY NO. 4:** Identify every software application and/or system utilized by Chubb & Son, a division of Federal, or by any division or entity other than Chubb & Son, that utilizes in any way the Blaze Advisor® software, and:

- a. Identify all Persons known to you to have knowledge of each such software application and/or system; and
- b. Identify all documents relating to each such software application and/or system.

**SUPPLEMENTAL ANSWER:** Federal objects to this Interrogatory as unduly burdensome, over broad, and because it seeks information that is not relevant to any claim or defense in this action. To the extent this Interrogatory can be read to ask for identifying groups within or without the Chubb organization that have at any time used any applications, which at some time utilized in any way the Blaze Advisor software, Federal objects to the Interrogatory as vague and ambiguous and overly burdensome, in particular because it does not include any time limitation, as seeking information not relevant to the claims and defenses in this action, and as not proportional to the needs of the case. Federal will limit its answer to reasonably available information after April 22, 2010, which is six years prior to the lawsuit being filed and reflects the outermost limit of the statute of limitations. Subject to, and without waiving these objections, Federal identifies the below business units and software applications as having utilized Blaze Advisor software:

SBU	Application
CSI	CSI Express, including CIS Claims  Decision Point  Automated Renewal Process
CCI	CUW  IRMA (Individual Rate Modification Application)  TAPS (Texas Accident Prevention System)
CBS (Corporate Business Systems)	Premium Booking
Surety	Cornerstone
CAH	Evolution
EUZ	Adapt-ABL  EZER

Further answering Interrogatory No. 4, Federal states that it does not track use of the above software applications by entity or division, but rather by business unit. The column on the left in the chart above identifies the business units that have used the software, including Chubb Specialty Insurance, Chubb Commercial Insurance, Chubb Business Systems, Claims, Surety, Canada Accident and Health, European Zone. Further answering Interrogatory No. 4, pursuant to Fed. R. Civ. P. 33(d), Federal refers to emails sent and received, along with corresponding documents, regarding use of these applications, including for example FED001501, FED004571, FED005531, FED006252, FED008482, FED009343, FED009344, FED009615, FED009617, FED009623,

FED009625, FED009648, FEDO09169, FED009913, FED010034, FED010686,  
FED010821, FED010823, FEDO10968, FED010970, FED011702, FED012278,  
FED012303, FED012308, FEDO12349, and states that the burden of further identifying  
the emails and documents relating to the use of the applications is substantially the same  
for both parties.

Dated: June 21, 2018

s/Terrence J. Fleming

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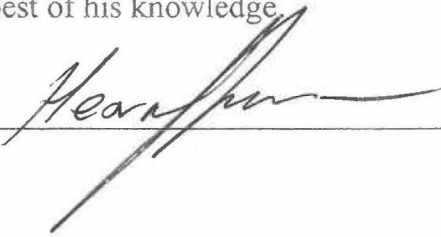
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*Attorneys for Defendant*

VERIFICATION

Henry Mirolyuz states under oath that he is a Senior Systems Architect at Chubb Insurance; that he is authorized to respond to Fair Isaac Corporation's Interrogatories on behalf of Federal Insurance Company; that he has relied on directors, employees, agents, and attorneys to provide information used in formulating the answers to interrogatories; and that the answers are true and correct to the best of his knowledge.

  
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Subscribed and sworn to before me  
this 30th day of July, 2018.

  
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Notary Public

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